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16 Attorneys for Plaintiff,

17 OUIBY INC., d/b/a KICKFURTHER

18 UNITED STATES DISTRICT COURT

19 NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

20 OUIBY INC., d/b/a KICKFURTHER,

21 Plaintiff,

22 v.

23 IDIL DOGUOGLU-POSEY, CARL POSEY
24 PHOTOGRAPHY, INC., CARL POSEY,

25 Defendants.

Case No. 3:17-CV-03847-EMC

**STIPULATION TO EXTEND THE DATE
OF CASE MANAGEMENT CONFERENCE
HEARING AND [PROPOSED] ORDER**

Trial Date: None Set

26 In accordance with Local Rule 6-1(b), 6-2 and 7-12, plaintiff OUIBY INC., d/b/a
27 KICKFURTHER (“Kickfurther”) and defendants IDIL DOGUOGLU-POSEY, CARL POSEY
28 PHOTOGRAPHY, INC., and CARL POSEY (“Defendants,” unless stated otherwise) (collectively,
the “Parties”), hereby stipulate (subject to the approval of the Court) to extend the date with respect to
the upcoming Case Management Conference set for June 28, 2018, and all other dates currently on the
Court’s docket, so that the Parties can complete the settlement process, including the execution of all
relevant settlement documents.

- 1 The Parties state and stipulate as follows:
- 2 1. WHEREAS, on January 22, 2018, the Parties participated in a Settlement Conference
- 3 before the Honorable Magistrate Judge Robert M. Illman;
- 4 2. WHEREAS, Kickfurther and Idil Doguoglu-Posey settled the case as to themselves;
- 5 3. WHEREAS, Kickfurther agreed to dismiss Carl Posey, individually;
- 6 4. WHEREAS, Kickfurther had filed a Motion to Enforce Settlement that was set to be heard
- 7 on May 17, 2018, which Kickfurther has now withdrawn without prejudice pursuant to the
- 8 Notice of Withdrawal of Motion to Enforce without Prejudice filed on May 4, 2018;
- 9 5. WHEREAS, there is currently a Case Management Conference set for June 28, 2018;
- 10 6. WHEREAS, Defendants are currently reviewing the settlement documents and need more
- 11 time to complete their review and respond to Kickfurther;
- 12 7. WHEREAS, Kickfurther will then need time to evaluate Defendants' comments to finalize
- 13 the settlement documents;
- 14 8. WHEREAS, the Parties believe that, in the interest of saving judicial resources, the date of
- 15 the Case Management Conference should be continued thirty (30) days from June 28,
- 16 2018, to give the Parties time to complete the settlement process;
- 17 9. WHEREAS, continuing the hearing date on the Case Management Conference to July 31,
- 18 2018 will save judicial resources and, and may obviate the need for the Case Management
- 19 Conference;
- 20 10. WHEREAS, the Parties believed that good cause exists to grant the instant stipulated
- 21 request; and
- 22 11. WHEREAS, this continuance of Case Management Conference is sought in good faith
- 23 and not for any improper purpose. Pursuant to Local Rules 6-1(b), 6-2 and 7-12, the
- 24 Parties stipulate to continue the upcoming Case Management Conference currently set for
- 25 June 28, 2018 to July 31, 2018, so that the Parties can have sufficient time to complete the
- 26 settlement process.

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1 Dated: June 14, 2018

2 By: /s/ Idil Doguoglu-Posey
3 Idil Doguoglu-Posey

4 Dated: June 14, 2018

5 By:
6 /s/ Carl Posey
7 Carl Posey

8 DATED: June 14, 2018

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By: /s/ René I. Gamboa
René I. Gamboa
Attorneys for Plaintiff,
OUIBY INC., d/b/a KICKFURTHER

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~~PROPOSED~~ ORDER

After consideration of the Parties stipulation set forth above:

IT IS HEREBY ORDERED THAT the Case Management Conference, which is currently set for June 28, 2018, shall be continued to ~~July 31, 2018.~~ August 16, 2018 at 10:30 a.m. An updated

IT IS SO ORDERED.

joint CMC statement shall be filed by August 9, 2018.

DATED: June 21 2018

